

## Parks and Recreation Department

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September 10, 2008

Surface Transportation Board 395 E Street, S.W. Washington, DC 20423-0001

RE: SHPO Case No. 08-1481

Docket No. AB-515 - 2 X

Central OR & Pacific RR (CORP) Abandonment Project

Multiple legals, Various, Coos/Douglas/Lane County

We have reviewed the materials submitted on the project referenced above, and we do not concur with the determination that the property is ineligible for the National Register. We believe that the rail line is eligible for the National Register of Historic Places as a linear district in accordance with 36 CFR Part 60.4.

Although we believe the property is eligible, we also believe that a no adverse effect finding is warranted for the abandonment of this line if the Central Oregon and Pacific Railroad, Inc. does not plan to remove any of the features of the rail line. If removal is planned, then additional documentation and coordination should occur with this office to mitigate for the adverse effect.

If the bridges are proposed for removal, then consultation under Section 106 of the National Historic Preservation Act will certainly be required. Given the scale and significance of these historic structures, mitigation would be extensive and would likely include thorough documentation to the standards of the Historic American Engineering Record.

Please let me know if we can be of further assistance with this project.

Tim Wood

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Director and State Historic Preservation Officer

cc. Chris Warner, ODOT
Sandra Brown, Troutman Sanders, LLP
Jeff Griffin, Governor's Office